



Pierce County

Department of Planning and Land Services

2401 South 35th Street
Tacoma, Washington 98409-7460

May 10, 2013

Lynn Peterson, Secretary of Transportation
Washington State Department of Transportation
PO Box 47300
Olympia, WA 98504

DENNIS HANBERG
Director

Received

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Environmental Services Office
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RE: McMillin Bridge Replacement Over State Route 162

Dear Secretary Peterson:

At the time of its construction in 1934, the McMillin Bridge was the longest reinforced concrete truss span in the United States. The engineer, Homer M. Hadley, was one of Washington State's most innovative and important bridge engineers. The McMillin Bridge is the only known standing example of a Pratt concrete through truss in the United States. The Bridge is listed on the National Register of Historic Places, the Washington State Heritage Register, and has been surveyed by the Historic American Engineering Record, under the U.S. Department of the Interior. The Bridge's placement on these historic registers is testimony to the structure's unique significance.

We have reviewed and concur with the concerns voiced by Elizabeth Merritt, Deputy General Counsel of the National Trust; Brian Turner, Regional Attorney for the Western Office of the National Trust; Eric DeLony, Chief (Emeritus) HAER for the National Park Service; Kitty Henderson, Executive Director of the Historic Bridge Foundation; and Chris Moore, Field Director for the Washington Trust for Historic Preservation. The Bridge is an important part of Pierce County, Washington State, and National history. Given the extreme rarity of the Bridge's construction techniques, treatment of this Bridge should not be an afterthought. It appears that Washington State Department of Transportation (WSDOT) planned to remove the bridge from the start of their planning process, even though a new bridge will be on a new alignment; mitigating any need to demolish the McMillin Bridge. Demolishing an important historic resource as mitigation for new construction is not an appropriate course of action. WSDOT has provided no justifiable reason to hinge construction of a new bridge to demolition of an existing bridge. If the McMillin Bridge was left in place, and WSDOT simply requested a permit for new construction, our understanding is that the Corps would grant this request.

WSDOT's document, "State Route 162 McMillin Bridge Preservation Alternatives Analysis [sic]," consistently states that any option that maintains the bridge in place as a state-owned property is not feasible, thus demolition is the only possible action. Although WSDOT is refusing to retain ownership of the National and State Register-listed structure, it has not given any firm legal reason for this stance. Nor have they, to our knowledge, explored other possibilities, including continued State ownership augmented by an agreement with Pierce County where the County could maintain the Bridge as part of the Foothills Trail. We feel there are other options that need to be carefully evaluated. Consulting party comments indicated that some of these options have been brought to WSDOT's attention, and yet we see no documented evidence of good faith to explore them.



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In February, the Pierce County Landmarks and Historic Preservation Commission recommended placement of the McMillin Bridge on the Pierce County Register of Historic Places. Letters of support from the Heritage League of Pierce County, the Historic Bridge Foundation, and Historic Tacoma accompanied the nomination. Last week, nomination of the McMillin Bridge was approved at the County committee level, and the nomination now moves forward to the full County Council for a vote.

Sincerely,

Caroline T. Swope/cla

Caroline T. Swope, M.S.H.P., Ph.D.
Chair, Pierce County Landmarks and Historic Preservation Commission

CTS:cla

c: Roger Kiers, WSDOT, PO Box 47332, Olympia, WA 98504-7332
Sandra Manning, Project Coordinator, Army Corps of Engineers, 4735 E. Marginal Way S.,
PO Box C-3755, Seattle, WA 98124
Allyson Brooks, Ph.D., State Historic Preservation Officer, PO Box 48343, Olympia, WA 98504-8343
Chris Moore, Washington Trust for Historic Preservation, 1204 Minor Ave., Seattle, WA 98101



The Pierce County Historic Preservation and Landmarks Commission in front of the McMillin Bridge, with "This Place Matters" signage, May 2011